

11-23-94
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ASH GROVE CEMENT COMPANY

WESTERN REGION

DATE: November 23, 1994
TO: Jerry Brown, Safety/Environmental Manager
FROM: Ben McBride, Maintenance Supt.
SUBJ: PCB Survey/Inspection of September 27, 1994: Mr. Lazzar
EPA Letter of November 8, 1994: Mr. Hedgebeth

All of our transformers and other oil filled electrical devices were purchased new and installed between May, 1989 and March, 1994, with one exception: The 1000 KVA Transformer on top of the Coal Mills has long been in service and has routinely been tested and determined to have a non-detectable PCB level. On the new transformers, no PCB study has been conducted.

Of the ten transformers on our plant site, nine were specifically purchased and installed to remove Poly Chlorinated BI Phenyls from our plant.

There are NO transformers on site that were retrofilled.

In 1980 a survey of all of the old plant switchgear was completed. Many transformers, switches and capacitors were found to contain moderate to high levels of PCB's. In the period from 1980 through 1988, some of the transformers were retrofilled to bring the PCB levels below 50 PPM, but when the decision to modernize our plant was coupled with the more stringent <1 PPM PCB limit we were directed to remove all electrical equipment containing PCB's. This was completed in 1991. In 1994, two additional new transformers were added in the finish mill.

Please find the attached transformer listing showing manufacturer, serial number, etc. You will also find a copy of the analysis of our one remaining 'old' transformer: Coal Mills Transformer 468.710, S/N RHE0282.

USEPA SF



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ASH GROVE CEMENT CO.

OIL FILLED TRANSFORMER LISTING

Equip ID	Location	Manuf.	Manuf. Date	Install. Date	Serial #	KVA	Oil Cap.	Oil Type
468.710	COAL MILL	STANDARD	UNKNOWN	NOTE 1	RHE0282	1000	240	MIN. OIL
478.710	CLNKR SILO	WESTINGHOUSE	5/89	08/18/89	PAL3845-0101	750	194	SILICONE
548.710	FM BLDG	WESTINGHOUSE	5/89	08/19/89	PAL3846-0102	1000	211	SILICONE
548.810	FM BLDG	WESTINGHOUSE	5/89	08/19/89	PAL3846-0101	1000	211	SILICONE
548.910	FM BLDG	G.E.	UNKNOWN	4/91	R274252A	1000	162	SILICONE
910.810	GP II	WESTINGHOUSE	5/89	08/18/89	PAL3845-0102	750	194	SILICONE
940.710	PACKHOUSE	WESTINGHOUSE	UNKNOWN	3/89	TAT1180-01	1500	308	MIN. OIL
548.710A	FM BLDG	SIEMENS	UNKNOWN	3/94	PZD-0313	500	169	MIN. OIL
548.810A	FM BLDG	SIEMENS	UNKNOWN	3/94	PZD-0314	500	169	MIN. OIL
721.000	OLD SUBSTATION	G.E.	6/91	5/91	P812160TTF	N/A	27	MIN. OIL

NOTE 1. SEE PCB ANALYSIS FOR COAL MILL TRANSFORMER 468.710 ATTACHED